

EXHIBIT A

IN THE CHIEF MAGISTRATE COURT OF THE FCT
IN THE ABUJA MAGISTERIAL DISTRICT
HOLDEN AT ABUJA

BETWEEN:

CASE NO:- CR/124/2022

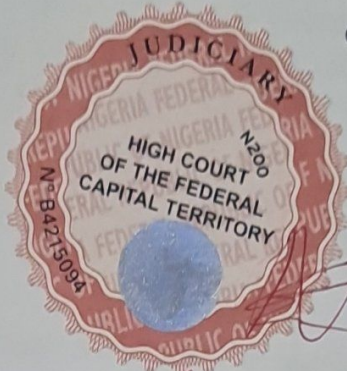
MIKE ENAHORO-EBAH

COMPLAINANT

AND

BOLA AHMED TINUBU

DEFENDANT



DIRECT CRIMINAL COMPLAINT

(BROUGHT PURSUANT TO SECTIONS 88 (1), 89 (3), 109 (A), 110 (C) AND 115 (1) (B) AND 119 OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT, 2015; AND UNDER THE INHERENT JURISDICTION AND POWERS OF THE HONOURABLE COURT SECURED BY SECTION 6(6)(a) OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999 AS AMENDED)

THIS Direct Criminal Complaint is lodged against the Defendant, **BOLA AHMED TINUBU** of No: 2, Justice Lawal Uwais Street, Beside Lagos State Government Lodge Annex, Asokoro District, Abuja - FCT, as follows:

1. On or about the 17th day of June, 2022, at the Head Quarters of Independent National Electoral Commission (INEC), at Plot 436 Zambezi Crescent, Maitama District, Abuja, within the Jurisdiction of this Honourable Court, the Defendant, BOLA AHMED TINUBU, presented and/or submitted a forged document (Chicago State University Certificate) to the Independent National Electoral Commission (INEC), knowing it to be forged and with intent that it may in anyway be used or acted upon as genuine, thereby committed the offence of Forgery contrary to Sections 362(a), 363 and 364 of the Penal Code Act, Cap. 532, Laws of the Federal Capital Territory, Abuja.

PARTICULARS OF THE COMPLAINT/OFFENCE

1. The Complainant is a Legal Practitioner of over fifteen (15) years standing at the Nigerian Bar, a Human Rights Defender and Public Interest Litigator, who is presently the Managing Principal of Enahoro & Associates, a law firm based in Abuja-FCT.
2. The Complainant is a citizen of Nigeria, and who, like every other citizen of Nigeria, has the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order.

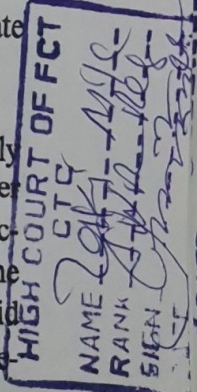
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A709

212589612
Date 10-11-22

Fee - 7550
R/a - 212589581
Date 11/11

HIGH COURT OF FCT
NAME: [Signature]
RANK: [Signature]
E/C: [Signature]

3. The Complainant, as a Legal Practitioner, is ethically obligated to promote and foster the cause of justice in Nigeria.
4. Premised on the above facts, the Complainant is duty bound to expose the commission of crime(s) by any person, including the Defendant, Public Officials, Agencies or Institutions howsoever described, whose acts could embarrass and dent the prestige and good name of Nigeria.
5. Consequently, the Complainant has brought this Direct Criminal Complaint against the Defendant.
6. The Defendant is the Presidential Candidate of All Progressives Congress (APC) for the 2023 Presidential Election in Nigeria who, on the 17th day of June 2022, in line with the requirement of the Electoral Act, submitted his sworn **FORM EC9 (AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS - Particulars of persons seeking election to the office of President of the Federal Republic of Nigeria)** to Independent National Electoral Commission (INEC).
7. The above information was made public and available to the media on the 17th day of June, 2022, by the Defendant's media office signed by Mr. Tunde Rahman, which informed the Complainant's request to INEC on the 13th day of July, 2022, for the issuance of Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC for the 2023 Presidential Election in Nigeria slated for the 25th day of February, 2023.
8. The Independent National Electoral Commission (INEC), deliberately refused to issue the Complainant the requested documents as above, which led to filing **SUIT NO:FHC/ABJ/CS/1337/2022; BETWEEN MIKE ENAHORO-EBAH vs. INEC**, at the Federal High Court, Abuja, Court 6, Presided over by *His Lordship, Honourable Justice D. U. Okorowo*.
9. Eventually, on the 15th day of August, 2022, the Independent National Electoral Commission (INEC) issued to the Complainant Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, including: National Youth Service Corps Certificate and Chicago State University Certificate.
10. Upon receipt of Defendant's Form for Nomination of President - EC13A, particularly EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, and upon thorough perusal of the documents particularly the supposed Chicago State University Certificate attached to the Form EC-9, the Complainant consequently caused a request to be made to the said school to obtain all documents and school records pertaining to the Defendant. The re-



quest to Chicago State University was made through a Colleague, Matthew J. Kowals of Leahy, Eisenberg & Fraenkel, Ltd, a law firm based in Chicago, United States of America.

11. Matthew J. Kowals, issued an Attorney Subpoena on behalf of the Complainant against Chicago State University in **Case/Court No: 22-L-007289**, filed on the 12th day of August 2022, headed the **Circuit Court of Cook County, Illinois**, directing the University to mail to Counsel all documents and school records pertaining to the Defendant in their possession and custody.
12. In compliance with the Subpoena issued, Chicago State University wrote a letter dated the 22nd day of September 2022, addressed to Matthew J. Kowals, and enclosed therein "all the records" the school have pertaining to the Defendant. The Records/Documents released include:
 - I. Copy of Chicago State University Certificate,
 - II. Copy of Academic Records,
 - III. Copy of Undergraduate Admission Application Form,
 - IV. Copy of University of Cambridge General Certificate of Education,
 - V. Copy of Southwest College Transcript (Now City College of Chicago).
13. Curiously, the information contained in the documents and school records received from Chicago State University contradict material information provided by the Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and documents attached thereto, submitted to INEC.
14. The following are some of the information found in the documents and school records obtained from Chicago State University pertaining to the Defendant which contradict material depositions contained in Defendant's sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC:
 - I. The Bola Tinubu that attended Chicago State University was born in 1954 and not 1952 as claimed by the Defendant on oath in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC.
 - II. The Tinubu that attended Chicago State University indicated in his Undergraduate Admission Application Form that he is an American Citizen (Black American) while the Defendant, in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC at paragraphs 9, 10, 11, 12 indicated that he was a Nigerian citizen only and has never acquired the citizenship of another Country or pledged allegiance to any other country.

HIGH COURT OF FCT	
NAME	CTC MUE
RANK	CTC MUE
SIGN	
DATE	10/11/22

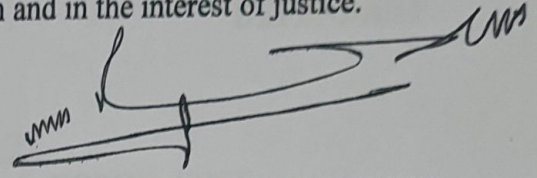
- III. The Tinubu that attended Chicago State University indicated in his Undergraduate Admission Application Form that he graduated from Government College, Lagos, in 1970, while the Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC provided no information as to his attendance of the said Government College Lagos.
- IV. In support of the Defendant's Undergraduate Admission Application Form submitted to Chicago State University in 1977, was a transcript from Southwest College, Chicago, bearing the name "TINUBU BOLA .A." which belonged to a "FEMALE". The Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC indicated that he is a MAN.
15. Most importantly, the copy of the Chicago State University Certificate belonging to Bola A. Tinubu released pursuant to the said Subpoena served on Chicago State University, is radically different from the copy attached to the Defendant's sworn **Form EC-9 - AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS**, submitted to INEC on the 17th day of June, 2022.
16. A direct comparison of both Certificates reveal the following:
- I. Different dates of issue by the University (22nd day of June 1979 and 27th day of June 1979),
 - II. Different University logo on both Certificates,
 - III. Different sentences and/or grammatical construction on faces of Certificates,
 - IV. Different signatures for Chairman, Board of Trustees, on both Certificates,
 - V. Different signatures for President of the University, on both Certificates,
 - VI. Different font type used in the writing of both Certificates,
 - VII. The copy of the Certificate obtained from Chicago State University, contain only two (2) signatures belonging to the Chairman, Board of Trustees and President of the University. No other party signed, unlike the one submitted to INEC by the Defendant which was signed by a third person.
17. Based on the obvious contradictions, the Complainant verily believes that the Defendant submitted a forged Chicago State University Certificate dated 22nd June 1979 to INEC with the intention of causing INEC to believe that said certificate was genuine for the purpose of qualification for election to the office of President.
18. The Complainant, as a citizen of Nigeria, saddled with the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order, has now lodged this Direct Criminal Complaint alleging **Forgery** against the Defendant.

10/11/23

HIGH COURT OF FCT	
CTG	
NAME	Lamin M. 118
RANK	102
SIGN	

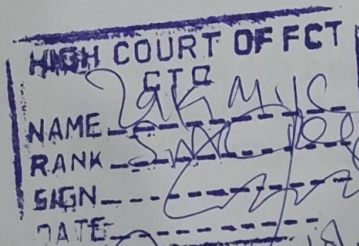
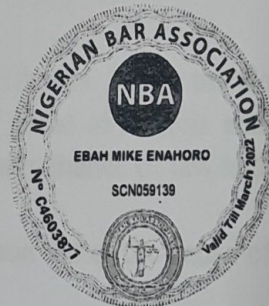
19. It is in the best interest of Nigeria, justice and equity to issue Criminal summons to ensure the Defendant's attendance to answer to this Complaint.
20. The Complainant verily believes that the Defendant who is within the Jurisdiction and District of the Federal Capital Territory, Abuja, is likely to leave the jurisdiction and district within the next Forty-Eight (48) Hours if not summoned by the Honourable Court to appear immediately.
21. The Honourable Court has the statutory and inherent powers to direct that the Defendant be brought to answer to this Complaint.
22. This Direct Criminal Complaint is made in good faith and in the interest of justice.

Dated this 9th day of November, 2022



Mike Enahoro-Ebah, Esq.
ENAHORO & ASSOCIATES

Suite 202, First floor, Fortune Plaza,
No. 8, Nairobi Street, Off Aminu Kano Crescent,
Wuse II, Abuja, FCT.
Tel: +2348065200546,
E-mail: mikeebah@nigerianbar.ng;
mykzolo@hotmail.com



**IN THE CHIEF MAGISTRATE COURT OF THE FCT
IN THE ABUJA MAGISTERIAL DISTRICT
HOLDEN AT ABUJA**

BETWEEN:

CASE NO:-

MIKE ENAHORO-EBAH

.....

COMPLAINANT

AND

BOLA AHMED TINUBU

.....

DEFENDANT

**VERIFYING AFFIDAVIT
IN SUPPORT OF DIRECT CRIMINAL COMPLAINT**

I, Mike Enahoro-Ebah, Male, Christian, Legal Practitioner and Nigerian Citizen of Suite 202, First floor, Fortune Plaza, No. 8, Nairobi Street, Off Aminu Kano Crescent, Wuse II, Abuja, FCT do hereby make Oath and state as follows: THAT

1. I am the Complainant in this Direct Criminal Complainant.
2. I am a Legal Practitioner of above fifteen (15) years standing at the Nigerian Bar, Human Rights Defender and Public Interest Litigator, presently the Managing Principal of Enahoro & Associates, a law firm based in Abuja-FCT.
3. I am a citizen of Nigeria, and like every other citizen of Nigeria, I have the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order.
4. That as a Legal Practitioner, I am obligated to promote and foster the cause of justice in Nigeria.
5. Premised on the above facts, I verily believe that I am duty bound to expose the commission of crime(s) by any person, including the Defendant, Public Officials, Agencies or institutions howsoever described, whose acts could embarrass and dent the prestige and good name of Nigeria.
6. Consequently, I have filed this Direct Criminal Complaint against the Defendant.
7. I hereby verify the facts contained in this Direct Criminal Complaint as true and correct to the best of my knowledge.

HIGH COURT OF FCT	
CTF	
NAME	Mike Enahoro-Ebah
RANK	Legal Practitioner
SIGN	[Signature]
DATE	10/11/22

8. The Defendant is the Presidential Candidate of the All Progressives Congress (APC) for the 2023 Presidential Election in Nigeria who, on the 17th day of June, 2022, in line with the requirement of the law, submitted his sworn **FORM EC9 (AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS - Particulars of persons seeking election to the office of President of the Federal Republic of Nigeria)** to the Independent National Electoral Commission (INEC).
9. The above information was made public and available to the media on the 17th day of June, 2022, by the Defendant's media office signed by Mr. Tunde Rahman, which informed my request/application to INEC on the 13th day of July, 2022, for the issuance of Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC for the 2023 Presidential Election in Nigeria slated for the 25th day of February, 2023. Find attached herewith an acknowledged copy of the said Letter dated the 13th day of July, 2022, marked as **EXHIBIT 1**.
10. The Independent National Electoral Commission (INEC), deliberately refused to issue me the requested documents as above, which led to filing **SUIT NO:FHC/ABJ/CS/1337/2022; BETWEEN MIKE ENAHORO-EBAH vs. INEC**, at the Federal High Court, Abuja, Court 6, Presided over by *His Lordship, Honourable Justice D. U. Okorowo*.
11. Eventually, on the 15th day of August, 2022, the Independent National Electoral Commission (INEC) issued to me Certified True Copies (CTC) of the Defendant's Form for Nomination of President - EC13A and EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, including: NYSC Certificate of National Service and Chicago State University Certificate. Find attached herewith CTC of Form EC-9, CTC of Chicago State University Certificate submitted to INEC by the Defendant as well as INEC's letter of approval for issuance of CTC and Receipt of payment dated 15th day of August 2022, marked as **EXHIBITS 2, 3, 4 & 5** respectively.
12. Upon receipt of Defendant's Form for Nomination of President - EC13A, particularly EC 9 - **AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and all other documents submitted to INEC by the Defendant, and upon thorough perusal of the documents particularly the supposed Chicago State University Certificate attached to EC-9, been suspicious, I caused a request to be made to the said school to obtain all documents and school records pertaining to the Defendant. The request to Chicago State University was made through a Colleague, Matthew J. Kowals of Leahy, Eisenberg & Fraenkel, Ltd, a law firm based in Chicago, United States of America.
13. Matthew J. Kowals, issued an Attorney Subpoena on my behalf against Chicago State University in **Case/Court No: 22-L-007289**, filed on the 12th day of August, 2022, headed the **Circuit Court of Cook County, Illinois**, directing the University to mail to Counsel all documents and school records pertaining to the Defendant in their posses-

sion and custody. Find attached copy of Counsel Subpoena issued against Chicago State University in **Case/Court No: 22-L-007289**, filed on the 12th day of August, 2022, marked as **EXHIBIT 6**.

14. In compliance with the Subpoena issued, Chicago State University wrote a letter dated the 22nd day of September, 2022, addressed to Matthew J. Kowals, and enclosed therein "all the records" the school has pertaining to the Defendant. Find attached copy of the letter dated the 22nd day of September, 2022, addressed to Matthew J. Kowals marked as **EXHIBIT 7**.
15. The Records/Documents enclosed in Chicago State University letter dated the 22nd day of September, 2022, include:
- I. Copy of Chicago State University Certificate (**EXHIBIT 8**),
 - II. Copy of Academic Records (**EXHIBIT 9**),
 - III. Copy of Undergraduate Admission Application Form (**EXHIBIT 10**),
 - IV. Copy of University of Cambridge General Certificate of Education (**EXHIBITS 11**),
 - V. Copy of Southwest College Transcript (Now City College of Chicago) (**EXHIBIT 12**).
16. Curiously, the information contained in the documents and school records received from Chicago State University contradict material information provided by the Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** and documents attached thereto, submitted to INEC.
17. The following are some of the information found in the documents and school records obtained from Chicago State University pertaining to the Defendant which contradict material depositions contained in Defendant's sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC:
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 - III. The Tinubu that attended Chicago State University indicated in his Undergraduate Admission Application Form that he graduated from Government College, Lagos, in 1970, while the Defendant in his sworn **Form EC-9 AF-**

10/11/22
HIGH COURT OF FCT
NAME - [Signature]
RANK - [Signature]
SIGN - [Signature]

FIDAVIT IN SUPPORT OF PERSONAL PARTICULARS submitted to INEC failed to supply information as to his attendance of the said school.

- IV. In support of the Defendant's Undergraduate Admission Application Form submitted to Chicago State University in 1977, was a transcript from Southwest College, Chicago, bearing the name "TINUBU BOLA .A." which belonged to a "FEMALE". The Defendant in his sworn **Form EC-9 AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS** submitted to INEC, indicated that he is a MAN.
18. Most importantly, the copy of Chicago State University Certificate issued to one Bola A. Tinubu, made available to me vide the said Subpoena by Chicago State University, is radically different in form, content and character from the copy attached to the Defendant's sworn **Form EC-9 - AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS**, submitted to INEC on the 17th day of June, 2022.
19. A direct comparison of both Certificates reveal the following:
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 - VII. The copy of the Certificate obtained from Chicago State University, contain only two (2) signatures belonging to the Chairman, Board of Trustees and President of the University. No other party signed, unlike the one submitted to INEC by the Defendant which was signed by a third party.
20. Based on the above differences between the two Certificates, I verily believe that the Defendant submitted a forged Chicago State University Certificate to INEC on or about the 17th day of June 2022.
21. As a citizen of Nigeria, saddled with the Constitutional duty to help to enhance the power, prestige and good name of Nigeria and as well as render assistance to appropriate lawful agencies in the maintenance of law and order, I have now filed a Direct Criminal Complaint alleging **Forgery** against the Defendant as per the Chicago State University Certificate submitted and/or presented to INEC on the 17th day of June 2022.
22. It is in the best interest of Nigeria, justice and equity to issue Criminal Complaint against the Defendant and order criminal summons to ensure his attendance to this Complaint.
23. I verily believe that the Defendant who is within the Jurisdiction and District of the Federal Capital Territory, Abuja, is likely to leave the Jurisdiction and District within the

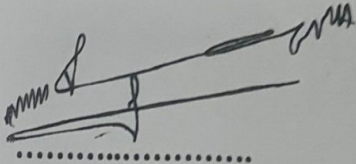
HIGH COURT OF JUSTICE
NAME: [Signature]
RANK: [Signature]
SIGN: [Signature]
DATE: 10/11/22

next Forty-Eight (48) Hours if not summoned by this Honourable Court to appear immediately.

24. I verily believe that this Honourable Court has the statutory and inherent powers to direct that the Defendant be brought to answer to this Complaint.

25. This Direct Criminal Complaint is made in good faith.

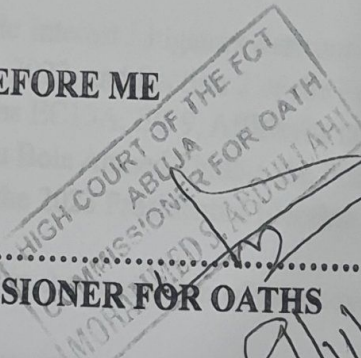
26. I swear to this verifying affidavit in good faith, conscientiously believing its contents to be true and in accordance with the Oaths Act.



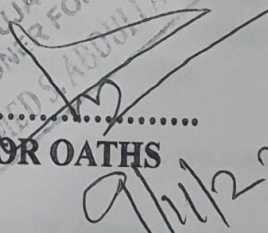
DEPONENT

Sworn to at the
Registry of the Magistrate Court, Abuja
This ... 9th ... day of November, 2022

BEFORE ME



.....
COMMISSIONER FOR OATHS



9/11/22

HIGH COURT OF THE FCT	
DATE	9/11/22
NAME	SAKIN ANIS
RANK	CLERK
SIGN	[Signature]
10/11/22	



ENAHORO & ASSOCIATES

Legal Practitioners and Consultants

FN-2298214

+ x /

13th July, 2022

THE SECRETARY

Independent National Electoral Commission (INEC),
Plot 436 Zambezi Crescent,
Maitama District,
FCT, Abuja.

13 JUL 2022

Dear Sir,

[Handwritten signature]

APPLICATION FOR CERTIFIED TRUE COPIES (CTC) OF NOMINATION FORMS EC13A AND EC 9 - AFFIDAVIT AND ALL OTHER DOCUMENT SUBMITTED THERETO BY OR ON BEHALF OF ASIWAJU BOLA AHMED TINUBU THE PRESIDENTIAL CANDIDATE OF APC

We are a Firm of Solicitors and Public Interest Litigators desirous of obtaining, pursuant to Section 29 (4) of the Electoral Act, 2022, and Section 2 of the Freedom of Information Act, 2011, copies of Nomination Forms EC13A, EC 9, Affidavits and all other documents submitted by and on behalf of Asiwaju Bola Ahmed Tinubu, the Presidential Candidate of All Progressives Congress (APC) for the 2023 Presidential Election.

We undertake to pay all fees incidental in the production of the above stated copies.

Whilst awaiting a timely response from you, please be assured of our commitment to justice delivery as always.

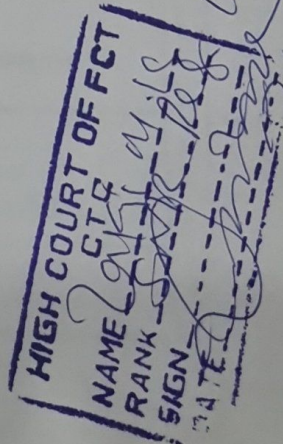
Yours faithfully,

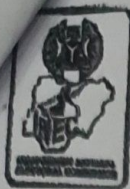
FOR: **ENAHORO & ASSOCIATES**

[Handwritten signature]

Mike Enahoro-Ebah, Esq.

(Managing Principal/Lead Counsel)





INDEPENDENT NATIONAL ELECTORAL COMMISSION

Plot 436 Zambezi Crescent, Maitama District, Abuja

EX 2

AFFIDAVIT IN SUPPORT OF PERSONAL PARTICULARS

Particulars of persons seeking election to the office/membership of: 17/6/22



INEC

2023 GENERAL ELECTION

RECEIVED

SIGN

PRESIDENT

☒

VICE PRES.

☐

GOV.

☐

DEP. GOV.

☐

SEN

☐

REPS.

☐

SHA

☐

CHAIRMAN A/C

☐

VICE CHAIRMAN

☐

COUNCILLOR A/C

☐

Tick as appropriate

CONSTITUENCY:

Nigeria

CODE:

PR/01

STATE:

NIGERIA

CODE:

38

FCT:

CODE:

HIGH COURT OF FCT

17/6/22
NAME: *...*
RANK: *...*
SIGN: *...*
DATE: *...*

Nationality:

NIGERIA

10. Have you voluntarily in the past changed Nationality? YES ☐ NO ☒

If Yes, what was your former Nationality?

11. Have you voluntarily acquired citizenship of any other country? If Yes, which country? YES ☐ NO ☒

12. Have you made a declaration of allegiance to that or any other country? If Yes, specify the country.

(Attach evidence)

YES ☐ NO ☒

INEC

2023 GENERAL ELECTION

RECEIVED

DATE 17/8/22

SIGN [Signature]

HIGH COURT OF FCT

CTS

NAME [Signature]

RANK [Signature]

SIGN [Signature]

DATE 17/8/22

RECEIVED COPY

17/8/22

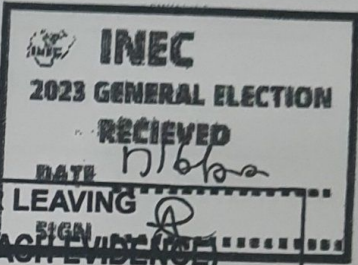
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SCHOOLS ATTENDED / EDUCATIONAL QUALIFICATIONS WITH DATES

(Attach evidence of all educational qualifications)

SN	SCHOOL	QUALIFICATION	YEAR
1	PRIMARY		0000
2	SECONDARY		0000
3	HIGHER	BSC BUSINESS AND ADMINISTRATION	1979

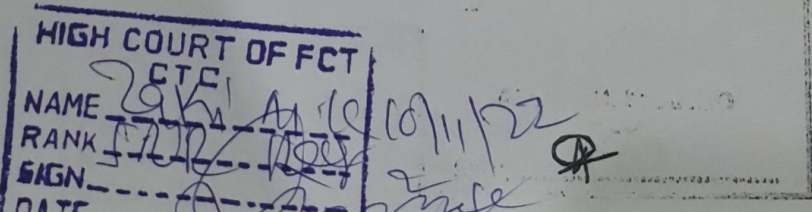
D (i). WORKING EXPERIENCE WITH DATES



NAME OF EMPLOYER	PERIOD OF WORK	REASON FOR LEAVING (PLEASE ATTACH EVIDENCE)
MOBIL OIL NIG PLS	1983-1992	POLITICS
NATIONAL ASSEMBLY (SEN)	1993	MILITARY INTERVENTION
LAGOS STATE (GOVERNOR)	1999-2007	END OF TWO TENURES

ii. Have you ever been dismissed from the Public Service of the Federation, State or Local Government / Area Council? If Yes, give details.

YES ☐ NO ☒



GENERAL

1. Have you ever been adjudged a lunatic or declared to be of unsound mind? If Yes, give details.

YES ☐ NO ☒

2. Are you under a sentence of death, imprisonment or fine, for any offence involving dishonesty or fraud or any offence imposed by a Court or Tribunal? If Yes, give details.

YES ☐ NO ☒

3. Have you in the last 10 years been convicted and/or sentenced for an offence or dishonesty? If Yes, give details.

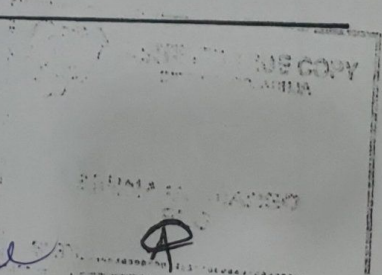
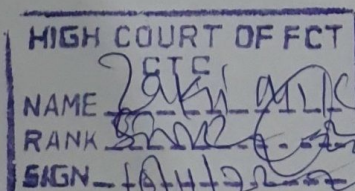
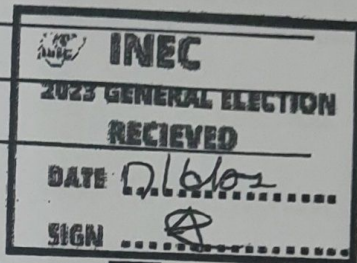
YES ☐ NO ☒

4. Have you ever been involved in any bankruptcy proceedings? If Yes, give details.

YES ☐ NO ☒

5. Have you ever been convicted by the Code of Conduct Tribunal? If Yes, give details.

YES ☐ NO ☒



6. Have you ever presented forged Certificate(s) to INEC? If Yes, give details.



YES ☐ NO ☒

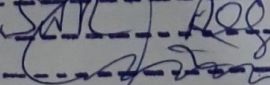
7. Do you or have you ever belonged to a Secret Society? If Yes, give details.


YES ☐ NO ☒

8. Give any information about your person.

NATIONAL LEADER OF ALL PROGRESSIVES
CONGRESS

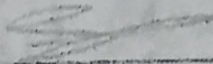
	INEC
2023 GENERAL ELECTION	
RECEIVED	
DATE	17/6/22
SIGN	

HIGH COURT OF FCT	
NAME	ESTHER M. de
RANK	SAC
SIGN	
DATE	

RECEIVED COPY	
17/6/22	
	

F. DECLARATION BEFORE A COMMISSIONER FOR OATHS IN THE HIGH COURT

I hereby declare that all the answers, facts and particulars I have given in this Form are true and correct, and I have, to the best of my knowledge, fulfilled all the requirements for qualification for the office I am seeking to be elected.


DEPONENT

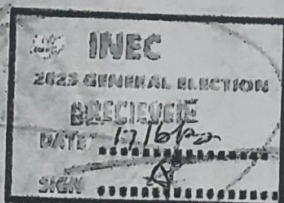
Sworn to at the (State/High Court) Registry

EST

This

Day of

14th June 2022



14/6/2022

COMMISSIONER FOR OATHS



3245966
14/6/22

From Mr. A. A. A.
R/W - 212568/49
Reck - 14/6/2022

10/11/22

HIGH COURT OF FCT	
NAME	<u>Mr. A. A. A.</u>
RANK	<u>...</u>
SIGN	<u>...</u>
DATE	<u>10/11/22</u>

CERTIFIED TRUE COPY

Chicago State University

On the recommendation of the faculty of the
College of Business

and under the authority of the Board of Trustees
of Chicago State University has conferred upon

Bala A. Tumbur

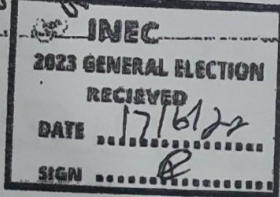
the degree of
Bachelor of Science
Business and Administration

With Honors

with all the rights, honors, and privileges pertaining thereto.

In testimony whereof the undersigned officers of Chicago State University have affixed their
signatures together with the Seal of the University in witness thereof this Diploma is granted

this twenty-second day of June A D 1979.



HIGH COURT OF FCT

NAME Justice M. C. 10/11
RANK Justice
SIGN [Signature]
DATE

For the Board of Trustees

William J. Lawrence
Chairman of the Board



For the University

John D. [Signature]

Kerest A. Conley

NATIONAL ELECTORAL COMMISSION
National Capital Territory of Guyana
Georgetown, Guyana

No./Sd. INEC/LEG/CTCG/38/2
Date: 15/8/2022

Eng. Mw. S. Associates
202, Freshman,
2 Nairobi Street,
West II, Abuja

44

ISSUANCE OF CERTIFIED TRUE COPIES OF DOCUMENTS

Your request for Certified True Copies of the attached documents refers.

2. Kindly acknowledge receipt of the certified documents as requested.

A. U. Mingo
For: Director, Legal Drafting & Clearance

Original copy of CTC collected by:

EC 'A'

- i. Name: Mike Freshman-Tsch
ii. Designation: Legal Practitioner
iii. Signature: [Signature]
iv. Date: 15/8/2022
v. GSM No. 080652-00 546

HIGH COURT OF FCT	
CTC	
NAME	<u>[Signature]</u>
RANK	<u>Legal</u>
SIGN	<u>[Signature]</u>
DATE	<u>10/11/22</u>



INDEPENDENT NATIONAL ELECTORAL COMMISSION (INEC)

ORIGINAL

Official Receipt

No. 046190

Date: 15-08-2022

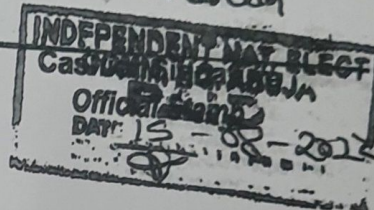
Received from: ENAHORO & ASSOCIATES

the sum of: One thousand Naira only

being: Payment for CTC of nomination forms EC13st and
EC9-Affidavit and all other document submitted
there to by or on behalf of ASIBUYA BOLU AKEHED

N 1,000 : = K

I hereby the
presidential
candidate of
APC



~~6~~ 5

HIGH COURT OF FCT
CTC
NAME Laki Mide
RANK SNR
SIGN [Signature]
DATE 10/11/22

Division Initial Case Management Dates will be heard via ZOOM.
more information and Zoom Meeting IDs go to https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4906_SelectTab/12
note Court date: No hearing information was found.

FILED
8/12/2022 2:17 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2022L007289
Calendar, B
19068898

Subpoena in a Civil Matter (For Testimony and/or Documents) (12/01/20) CCG 0106 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Mike Enahoro Ebah, et al
Plaintiff/Petitioner
v.
University of Chicago et al
Defendant/Respondent

Case No. 2022L007289

SUBPOENA IN A CIVIL MATTER
(For Testimony and/or Documents)

To: Chicago State University
9501 S. King Dr., Cook Admin Room 128
Chicago, IL, 60628

1. YOU ARE COMMANDED to appear to give your testimony before the
Honorable _____ in Room _____,
_____, Illinois on _____
at _____ AM PM
2. YOU ARE COMMANDED to appear and give your deposition testimony before a Notary Public
at: _____ in Room _____,
_____, Illinois on _____
at _____ AM PM
3. YOU ARE COMMANDED to mail the following documents in your possession or control
to Leahy, Eisenberg & Fraenkel at 33 W. Monroe, Ste. 1100, Chicago, IL 60603
on or before 9/11/22 at 5:00 AM PM
(THIS IS FOR RECORDS ONLY. THERE WILL BE NO ORAL INTERROGATORIES):
See attached rider.

Description continued on attached page(s).
Your failure to respond to this subpoena will subject you to punishment for contempt of this Court.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org
Page 1 of 2

HIGH COURT OF FCT
NAME [Signature]
RANK [Signature]
SIGN [Signature]
DATE 8/11/22



Handwritten marks: a large 'X' and a large 'h'.

FILED DATE: 8/12/2022 2:17 PM 2022L007289

Subpoena in a Civil Matter (For Testimony and/or Documents)

(12/01/20) CCG 0106 B

Notice to Deponent:

1. The deponent is a public or private corporation, partnership, association, or governmental agency. The matter(s) on which examination is requested are as follows:

Description continued on attached page(s).

(A nonparty organization has a duty to designate one or more officers, directors, or managing agents, or other persons to testify on its behalf, and may set forth, for each person designated, the matters on which that person will testify. Ill. Sup. Ct. Rule 206.)

2. The deponent's testimony will be recorded by use of an audio-visual recording device, operated by _____

(Name of Recording Device Operator)

3. No discovery deposition of any party or witnesses shall exceed three hours regardless of the number of parties involved in the case, except by stipulation of the parties or by order upon showing that good cause warrants a lengthier examination. Ill. Sup. Ct. Rule 206(d).

• Atty. No.: _____
Pro Se 99500

Name: Leahy, Eisenberg & Fraenkel Ltd

Atty. for (if applicable):

Petitioners

Issued by: /s/ Matthew J. Kowals

Signature

• Attorney Clerk of Court

Address: 33 W. Monroe, Ste 1100

City: Chicago

Date: 8/11/22

State: IL Zip: 60603

Telephone: 312 368 4554

Primary Email: mjk@lefltd.com

I served this subpoena by mailing a copy, as required by Ill. Sup. Ct. Rules 11, 12 and 204(a) (2),

to _____ by certified mail, return receipt requested

(Receipt # _____) on _____. I paid the witness \$ _____ for witness and mileage fees.

I served this subpoena by handing a copy to Belob Westberg on 8/15/2022. I paid the witness \$ 25.00 for witness and mileage fees.

/s/ [Signature]
(Signature of Server)

James W. Buttrick
(Print Name)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

Page 2 of 2

10/11/22
HIGH COURT OF CT

NAME [Signature]

RANK [Signature]

SIGN [Signature]

DATE [Signature]

SUBPOENA RIDER

Any and all records pertaining to the admission of Bola Ahmed Tinubu, date of birth alleged to be 03/29/1952, Social Security No. 321-06-0595 or 213-06-0595, as a student Chicago State University, including but not limited to his application for admittance at the University and all documents submitted to the University for consideration of his admittance; any and all records pertaining to the acceptance by Chicago State University of Bola Ahmed Tinubu as a student at the University, including but not limited to any correspondence or documentation evidencing his admittance as a student to the Chicago State University; any and all documents pertaining to any degrees attained by Bola Ahmed Tinubu from the Chicago State University or issued by the Chicago State University; and, in general, any documentation tending to prove that Bola Ahmed Tinubu was admitted as a student at the Chicago State University and attended school at Chicago State University as a student of the university, and/or any document evidencing that Bola Ahmed Tinubu did not attend, and/or was not admitted to, Chicago State University.

HIGH COURT OF FCT	
C.T.C	
NAME	<i>Laxmi</i>
RANK	<i>1st</i>
SIGN	<i>[Signature]</i>
DATE	<i>10/11/22</i>



CHICAGO STATE
UNIVERSITY

September 22, 2022

To Matthew J. Kowals:

Please be advised that Bola A. Tinubu attended Chicago State University from August 1977 - June 1979. He was awarded a Bachelor of Science degree in Business Administration with Honors on June 22, 1979.

The enclosed documentation is all the records we have for Bola A. Tinubu. We do not have a record of any documentation for a: passport, visa, social security card, or driver's license. Additionally, we do not have a record of how tuition was paid during his time of attendance.

Respectfully,

Caleb Westberg
Registrar
Office of Records and Registration
9501 South King Drive - ADM 128
Chicago, IL 60628
773-995-2517 (phone)
773-995-3618 (fax)
CSU-Registrar@csu.edu

9501 S. King Drive
Chicago, IL 60628
773.995.2000

HIGH COURT OF FCT	
NAME	J. K. M. S.
RANK	Sgt.
SIGN	[Signature]
DATE	10/11/22

Chicago State University

On the recommendation of the faculty of the
College of Business

and under the authority of the Board of Trustees, Chicago State University has conferred upon

Bola A. Timubu

the degree of

Bachelor of Science
Business and Administration
With Honors

with all the rights, honors and privileges pertaining thereto.

In testimony whereof, the undersigned officers of Chicago State University have affixed their signatures together with the seal of the University. In witness thereof, this diploma is granted
this twenty-seventh day of June, A.D. 1979.



Wray Lubin, M.D.
Chairman, Board of Trustees

Edward D. Dail
President of the University

HIGH COURT OF FCT	
CTC	
NAME	<i>Wray Lubin</i>
RANK	<i>Chairman</i>
SIGN	<i>Wray Lubin</i>
DATE	<i>6/27/79</i>

Chicago State University—Academic Record

9900 231-06-0596

OFFICE OF THE REGISTRAR
96TH ST. AT KING DRIVE
CHICAGO, ILLINOIS 60625-1598
BOLA A FINUHU

DATE OF BIRTH - 03/29/54
ILL ST & US CONSTITUTION
REQUIREMENT MET: YES

205

7424 SOUTH SHORE DR

CHICAGO

IL 60649

PAGE 1

01/30/97

COURSE/NUMBER		COURSE TITLE		CR. HRS.		GRADE		COURSE/NUMBER		COURSE TITLE		CR. HRS.		GRADE	
FALL 77								FALL 78							
TERM EARNED		27.00	GDPT	0.0	GPA	0.00		ECON 206		PRICE & ALLOC THEORY		3		B	
CSU EARNED		0.00	GDPT	0.0	GPA	0.00		ENG 127		COMPOSITION I		3		C	
CUM EARNED		27.00	GDPT	0.0	GPA	0.00		MATH 214		INTRO TO FINITE MATH		3		B	
		SOUTHWEST		76-77	027.00	SH		ACCT 316		ACC STANDARD AC/PROF		3		C	
								ACCT 317		AUDITING		3		W	
								MGMT 209		SMALL BUS MGMT		3		A	
TERM EARNED		15.00	GDPT	57.0	GPA	3.80		TERM EARNED		15.00	GDPT	42.0	GPA	2.80	
CSU EARNED		15.00	GDPT	57.0	GPA	3.80		CSU EARNED		66.00	GDPT	231.0	GPA	3.50	
CUM EARNED		42.00	GDPT	57.0	GPA	3.80		CUM EARNED		93.00	GDPT	231.0	GPA	3.50	
								WINTER 79							
MATH 152		PRE-CALCULUS II		3		B		ECON 230		QUAN ANALYS BUS/EC		3		A	
ACCT 213		INTERMED ACCT I		3		A		ENG 128		COMPOSITION II		3		B	
ACCT 291		BUSINESS LAW I		3		A		ACCT 293		FEDERAL INCOME TAX		3		A	
FIN 265		FINANCIAL MANAGEMENT		3		A		ACCT 317		AUDITING		3		A	
INSY 136		INT COMPUTER INF SYS		3		A		ACCT 325		INT AUDITING		3		A	
MKTO 275		MARKET MANAGEMENT		3		A		INSY 226		DECISION ANAL		3		A	
TERM EARNED		18.00	GDPT	69.0	GPA	3.83		TERM EARNED		18.00	GDPT	69.0	GPA	3.83	
CSU EARNED		33.00	GDPT	126.0	GPA	3.82		CSU EARNED		84.00	GDPT	300.0	GPA	3.57	
CUM EARNED		60.00	GDPT	126.0	GPA	3.82		CUM EARNED		111.00	GDPT	300.0	GPA	3.57	
								SPRING 79							
ART 130		PHOTOGRAPHY I		3		B		ENG 279		BUSINESS WRITING		3		B	
ACCT 214		INTERMED ACCT II		3		C		MATH 209		BASIC CALCULUS		3		B	
MGMT 250		MANAGE OF ORGANIZATN		3		A		POL 321		PRIN PUBLIC ADMIN		3		B	
TERM EARNED		6.00	GDPT	21.0	GPA	3.50		ACCT 394		ADV FED INCOME TAX		3		W	
CSU EARNED		39.00	GDPT	147.0	GPA	3.77		P E 117		TENNIS		1		W	
CUM EARNED		66.00	GDPT	147.0	GPA	3.77		TERM EARNED		9.00	GDPT	27.0	GPA	3.00	
								CSU EARNED		93.00	GDPT	327.0	GPA	3.52	
								CUM EARNED		120.00	GDPT	327.0	GPA	3.52	
								DEGREE REQUIREMENTS COMPLETED							
								WITH HONORS							
								DATE: JUNE 22 1979							
								DEGREE: BACH OF SCI IN BUS&ADM							
								MAJOR: ACCOUNTING							
								CURRICULUM: BUSINESS & ADMIN							
								BSBA0679							

1017

TINUBU, BOLA A.
7345 S. Shore Dr. - APT. 304
CHICAGO, IL 60649
Spec. Sec. No. 231-06-0595 Term 9-77T Major ACCOUNTING

752-0810

FORMER NAMES

ADMISSIONS DATA

ACT _____ Comp. Score _____ High School Gay College
SAT _____ GED _____ RANK 7th _____ 8th _____

Number of Semester Hours Attempted 30 GPA 3.10 Admitted 2-18-77 77

Examiner Spickard, J. - 9-2-77 JMK Rejected _____ (date) _____ (initials) _____

Readmission Data

_____ Reason: _____

Date _____

Not Received
By _____ Date _____

Received
By _____ Date _____

Control Card
Folder Code 9-77I

RESEARCH
High School Transcript
College Transcripts
Southwest

supplement

Medical
Discharge Papers

G.P.A.
Evaluation

ACK Letter
ASR Letter
ACC Letter

42 8-24
15 5/25

9/15/77

Chicago State University
Division of Student Affairs
Office of Admissions and Career Planning

Registration Dept 5, Illinois
12:30 PM

HIGH COURT OF FCT
NAME 2011 M. J. C.
RANK 2011
SIGN [Signature]
DATE 11/11/11

CHICAGO STATE UNIVERSITY
UNDERGRADUATE ADMISSIONS APPLICATION

9/77T

APPLICANT NUMBER

31060075

NAME TINUBU
LAST BOLA
FIRST A
MIDDLE A
DATE OF BIRTH 03/27/55
(W.S. Wilson)

SEX
FEMALE
MALE ☒

PERMANENT HOME ADDRESS
NUMBER AND STREET OR RAIL

APT NO

ZIP CODE

PHONE

ALIAS

X APRIN

7345 S. SMITH AVE

CHICAGO

APPROVAL

(ACCOUNTING)

BUS. + ADM

23

Wash, D.C.

01/11

HIGH COURT OF FCT

NAME Zaky M. JC

RANK Sgt

SIGN [Signature]

DATE 10/11/22

UNIVERSITY OF CAMBRIDGE



LOCAL EXAMINATIONS SYNDICATE

This is to certify that the candidate named below sat for a Joint Examination for the Higher School Certificate and General Certificate of Education and qualified for the award of a

GENERAL CERTIFICATE OF EDUCATION

The candidate passed at the level shown (Principal or Subsidiary) in the subject(s) named and attained the standard of the G.C.E. Advanced or Ordinary Level pass as indicated.

MOLA A. TIRUBU

N028705

PHYSICS
CHEMISTRY
BIOLOGY

H.S.C.
Standard

SUBSIDIARY
PRINCIPAL
PRINCIPAL

G.C.E.
Standard

ORDINARY
ADVANCED
ADVANCED

GRADE E
GRADE E

SUBJECTS RECORDED THREE

EXAMINATION OF NOVEMBER/DECEMBER 1970

Owen Chadwick

Vice-Chancellor

(See overleaf)

HIGH COURT OF FCT

NAME

RANK

SIGN

DATE

18/11/22

21

Southwest College

CITY COLLEGE OF CHICAGO
7309 S. PULASKI ROAD, CHICAGO 60652

Name Tinubu Bola A.

Address 7741 S. Shore Dr. Chicago 60649

Date of Birth SS No. 231-060-595 Date Entered 9/76

HIGH SCHOOL

Name Rank
City and State Graduated

COLLEGE RECORD

SEM. NRS. SCHOOL DATE(S) STATUS

DEPT. NAME NO. DESCRIPTIVE COURSE TITLE SEM. GRADE HRS.

TR. BAL. ACT. 1 231060595 SEMESTER 76

CURS 0111 INTRODUCTION TO ACCOUNTS 3.00 C
0211 BUSINESS LAW I 3.00 B
0201 GENERAL COURSE I 3.00 B

TINUBU BOLA A SPRING SEMESTER 77 231060595

BUS 0101 FUNDAMENTALS OF ACCOUNTING 3.00 C
ENGLISH 0101 COMPOSITION 3.00 A
PCL SCI 0201 THE NATIONAL GOVERNMENT 3.00 B
PSYCH 0201 GENERAL PSYCHOLOGY 3.00 A
SOC SCI 0101 GENERAL COURSE I SOC SCI 3.00 B
SPEECH 0101 FUNDAMENTALS OF SPEECH 3.00 B

TINUBU BOLA A HONORS LIST SUMMER SEMESTER 77 231060595

BUS 0102 PRINCIPLES OF ACCOUNTING 3.00 B
ECON 0201 PRINCIPLES OF ECONOMICS I 3.00 B

Notes: This transcript is not valid for transfer to another institution without official signature and stamp of the Registrar.
Student is entitled to Honorable Dismissal and is in good standing unless otherwise noted.
No Credit Toward A. A. Degree # CHANGE OF GRADE
FORM 2

EXEMPTIONS

HONORS

Gratified as proficient in the State and Federal Constitution and the code of the P. H. Y.

Date AUG 1 1977

Date

REGIS. T. A. R.

[Signature]
REGISTRAR

HIGH COURT OF FCT

NAME 2015 A/C

RANK 2015

SIGN [Signature]

DATE 2/11/18

LEAHY, EISENBERG & FRAENKEL, LTD

JOLIET OFFICE
20 W. CASS ST., 2ND FLOOR
JOLIET, IL 60432-4116
(815) 723-6514
FAX: (815)723-7466

ATTORNEYS AT LAW
33 WEST MONROE STREET, SUITE 1100
CHICAGO, ILLINOIS 60603-5317
(312) 368-4554
FAX: (312) 368-4562
www.lefltd.com

INDIANA OFFICE
917 RIDGE ROAD, UNIT 3328
MUNSTER, IN 46321
(219) 865-2647
FAX: (312) 368-4562

November 1, 2022

MATTHEW J. KOWALS
mjk@lefltd.com

Mike Enahoro - Ebah, Esq
ENAHORO & ASSOCIATES
Suite 202, First Floor,
Fortune Plaza, No.8 Nairobi Street,
Off Aminu Kano Crescent,
Wuse 2, Abuja, F.C.T

Re: Chicago State University Subpoena Documents
Court No.: 22-L-007289
Our File No: 21847

Dear Mr. Enahoro-Ebah,

As you know, my law firm was retained to issue subpoenas and obtain various documents pertaining to the educational background of Mr. Bola Ahmed Tinubu. Please find the subpoena our law firm issued to Chicago State University attached to this correspondence as Exhibit "A." The subpoena attached as Exhibit "A" was served upon Chicago State University in accordance with the laws of the State of Illinois. Following service of the subpoena, Chicago State University produced sixteen pages of documents, which are attached hereto as Exhibit "B." The documents attached to this correspondence as Exhibit "B" were produced by the Registrar of Chicago State University in response to the subpoena that was issued to Chicago State University. According to Chicago State University's Registrar, Caleb Westberg, the documents represent Chicago State University's entire student file pertaining to Mr. Bola Ahmed Tinubu, and are true, correct, and accurate copies of the entirety of Mr. Bola Ahmed Tinubu's student file.

Very truly yours,

LEAHY, EISENBERG & FRAENKEL, LTD.

By: Matthew J. Kowals

HIGH COURT OF FCT
NAME Matthew J. Kowals
RANK Attorney at Law
SIGN [Signature]
DATE 11/01/22